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February 15, 2019

Hon. Joel Schneider, U.S.M.J.
United States District Court for the
District of New Jersey
Mitchell H. Cohen Building and U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

VIA TELECOPY (856) 757-5355

Re: **Marshelle Hightower v. Ingerman Management Corp. et. al.**
USDC, DNJ, Docket No. 17-cv-8025 (RMB/JS)

Andre'a McDonald v IMC, Docket No. 17-cv-12787

Dear Judge Schneider:

We represent defendants in the above-referenced Hightower case. By prior Order, Your Honor established February 19, 2019 as the deadline for defendants to respond to plaintiff's outstanding three motions (for leave to file third amended complaint; to compel deposition questions be answered and for sanctions; and a spoliation motion). We are in the process of filing defendants' response to the motion to file third amended complaint (and I hope my office has e-filed that response by the time you get this letter) (I am working from home, on a limited basis, while I recuperate from my 2/5 replacement knee surgery). I also am nearing completion of defendants' response in opposition to the motion to compel deposition questions and sanctions, but am concerned about meeting the Court's 2/19 filing deadline. Accordingly, we respectfully request a brief extension, from 2/19 through 2/25, for defendants to file their responses to those two remaining motions.

Opposing counsel, Caren Gurmankin, Esquire, has no objection to our request, and asks for a similar six-day extension of her time to file any reply (to which request we do not object).

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Thank you for Your Honor's consideration. Please feel free to contact us, should the Court have any questions or problems or should the Court desire any further information from us.

Respectfully,


GARY LIGHTMAN

GPL:no

cc: Caren Gurmankin/Fernando Rivera, Esquires
Shaina Hicks/Shannon Farmer, Esquires
W. Lyle Stamps, Esquire
clients
(each via email)